

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	DATE FILED: _____
v.	:	VIOLATIONS:
	:	18 U.S.C. § 1546(a) (fraudulent use of a
CIRILO CASTILLO RIJO	:	passport - 1 count)
a/k/a "William Sastre Romero"		18 U.S.C. § 1028(a)(4) (fraud in
		connection with identification documents)
		- 1 count)
		18 U.S.C. § 911 (making a false claim of
		U.S. citizenship - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about January 7, 2004, at Philadelphia, in the Eastern District of Pennsylvania,
the defendant

CIRILO CASTILLO RIJO
a/k/a "William Sastre Romero"

knowingly uttered, used, and possessed a document required for entry into the United States, that
is, a genuine United States passport issued in the name of William Sastre Romero, which the
defendant knew to be procured by means of a false claim and statement and otherwise procured
by fraud and unlawfully obtained.

In violation of Title 18, United States Code, Section 1546(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 7, 2004, at Philadelphia, in the Eastern District of Pennsylvania,
the defendant

**CIRILO CASTILLO RIJO
a/k/a “William Sastre Romero”**

knowingly possessed an identification document other than one issued lawfully for his use, that
is, a passport issued by and under the authority of the United States of America, in the name of
William Sastre Romero, with the intent that such document be used to defraud the United States.

In violation of Title 18, United States Code, Section 1028(a)(4).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 7, 2004, at Philadelphia, in the Eastern District of Pennsylvania,
the defendant

CIRILO CASTILLO RIJO
a/k/a “William Sastre Romero”

an alien and citizen of the Dominican Republic, falsely and willfully represented himself to be a
citizen of the United States.

In violation of Title 18, United States Code, Section 911.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney